

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

IN RE:

BROOKLYNNE ALLEN
SSAN: XXX-XX-7634

Case No. 16-30364-DHW
Chapter 13

Debtor(s)

TRUSTEE'S OBJECTION TO CONFIRMATION

COMES NOW, the Trustee, by and through the undersigned counsel, and pursuant to 11 U.S.C. §1325 objects to confirmation of the debtor(s)' plan as filed. As grounds for said objection, the Trustee states as follows:

1. The debtor(s) filed a petition seeking relief under Chapter 13 of the United States Bankruptcy Code on February 10, 2016.
 2. The debtor(s) §341 Meeting of Creditors was held March 31, 2016.
- (X) The plan is not feasible and payments need to be raised to \$528.00 BI-WEEKLY to be feasible.
- (X) The plan is a composition plan and does not provide for the complete applicable commitment period as required by law.
- (X) The following creditor was listed as unsecured, but filed their claim as secured or priority. The debtor's plan fails to make provisions for this claim:

Creditor: STATE OF ALABAMA
Trustee's Claim Number: 67
Account Number: 7634-2010 TAX-NO PROV
Claim Amount: \$1,285.50
Court Claim Number: 17
Claim Filed As: SECURED

- (X) The following creditor was not listed in the debtor's schedules but filed their claim as priority or secured. The debtor's plan fails to make provisions for this claim:

Creditor: INTERNAL REVENUE SERVICE
Trustee's Claim Number: 66
Account Number: 7634-09,10,11 TAX-NO PROV
Claim Amount: \$15,190.00
Court Claim Number: 4
Claim Filed As: SECURED

(X) The plan fails to make provisions for the claim of the IRS at court claim #4/trustee#66.

(X) The plan fails to make provisions for the claim of the State of Alabama at court claim #18/trustee #68.

WHEREFORE, the above premises considered, Trustee objects to confirmation of the debtors' plan and requests that either confirmation be denied or the case be continued until such time as the above referenced issues have been resolved.

Respectfully submitted this April 25, 2016.

Office of the Chapter 13 Trustee
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Curtis C. Reding
Chapter 13 Trustee

By: /s/ Tina J. Hayes

Tina J. Hayes

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have served copies of the foregoing Trustee's Objection to Confirmation on the parties listed below by either electronic mail or by placing same in the U.S. Mail, postage prepaid and properly addressed this April 25, 2016.

Copy to: DEBTOR(S)
RICHARD D SHINBAUM

/s/ Tina J. Hayes
Tina J. Hayes